

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY**  
**DRAFT HAZARDOUS WASTE POST-CLOSURE RENEWAL PERMIT**

The LDEQ, Office of Environmental Services, is accepting written comments on a draft hazardous waste post-closure renewal permit for Pioneer Americas, LLC, Post Office Box 23, St. Gabriel, Louisiana 70776-0023 for the St. Gabriel facility. **The facility is located at 4205 Highway 75, in St. Gabriel, Iberville Parish.**

Pioneer Americas, LLC requested a renewal of the hazardous waste post-closure permit for the management and post-closure care of the Ponds 1-4, Sulfide Pond, North and South Surge Ponds. The facility is a site where corrective action is taking place to recover and remediate contaminated groundwater. Recovery wells pump contaminated groundwater to a waste recovery system where it is treated and discharged to a Publicly Owned Treatment Works (POTW). The hazardous waste unit involved in this permit action treated and disposed of hazardous waste generated at the site. The hazardous waste unit is currently closed and requires a permit to govern post-closure care.

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, September 10, 2007.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The draft hazardous waste post-closure renewal permit, fact sheet, the hazardous waste post-closure permit renewal application, and supporting documents are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

An additional copy may be reviewed at the Iberville Parish Library - East Iberville Branch, 5715 Monticello Street, St. Gabriel, LA 70776.

Inquiries or requests for additional information regarding this permit action should be directed to Toni Metoyer Booker, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-0956.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [deqmaillistrequest@la.gov](mailto:deqmaillistrequest@la.gov) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the draft hazardous waste post-closure renewal permit and associated information can be viewed on the LDEQ permits public webpage at**

[www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm)

**All correspondence should specify AI Number 2644, Permit Number 062666540-PC-RN-1, and Activity Number PER20010001.**

**Scheduled Publication Date: July 19, 2007 in The Post South and July 20, 2007 in The Advocate**

# FACT SHEET

# **FACT SHEET**

## **DRAFT HAZARDOUS WASTE RENEWAL PERMIT**

### **PREPARED FOR**

**PIONEER AMERICAS, LLC**

**EPA ID# LAD 062 666 540**

**Agency Interest# 2644**

**Activity# PER20010001**

**Iberville Parish  
St. Gabriel, Louisiana**

**Post-Closure Permit  
(LAD 062 666 540 PC-RN-1)**

## **I. INTRODUCTION**

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal facts and the significant factual, legal, methodological, and policy requirements of the draft post-closure permit for the Pioneer Americas, LLC, EPA ID Number LAD 062 666 540, located in St. Gabriel, Iberville Parish, Louisiana.

Pioneer is seeking a hazardous waste post-closure permit for seven closed surface impoundments identified in the permit application.

The proposed draft hazardous waste post-closure permit for the surface impoundment units addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA). The Louisiana Department of Environmental Quality (LDEQ) has prepared this draft hazardous waste permit for the closed units.

## **II. THE PERMITTING PROCESS**

The purpose of this fact sheet is to initiate the permitting decision process. The Office of Environmental Services –Waste Permits Division (OES-WPD) of the Louisiana Department of Environmental Quality (LDEQ) is required to prepare this draft hazardous waste post-closure permit. It sets forth all the applicable conditions, which the OES - WPD requires the permittee to comply with during the life of the permit.

The permitting process will afford LDEQ, interested citizens and any other agency the opportunity to evaluate the ability of the permittee to comply with the requirements of LAC 33:V.Subpart 1, and the HSWA portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft hazardous waste post-closure permit. The Administrative Authority, before deciding or taking any final action on the new draft hazardous waste permit, will consider all appropriate comments. The decision of the Administrative Authority will be to issue, deny, or modify the draft hazardous waste permit in accordance with LAC 33:V.705.

#### **A. DRAFT HAZARDOUS WASTE PERMIT**

The Louisiana Department of Environmental Quality-Office of Environmental Services (LDEQ-OES), Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft hazardous waste permit that contains the language pertaining to post-closure care of the listed units.

This draft hazardous waste permit is a tentative determination and is not the final decision of the Administrative Authority.

#### **B. PUBLIC COMMENT PROCEDURES**

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the St. Gabriel facility must do so within the forty-five (45) day comment period.

A. public hearing for the draft permit will be held, if requested, or if the draft permit generates a significant amount of public interest, on the date, and at the location and time provided in the public notice. LDEQ will hold the hearing within forty-five (45) days after the date on which the public notice is given.

Public notice of the proposed action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

#### **C. LOCATIONS OF AVAILABLE INFORMATION**

The administrative record, including all supporting documents, are on file at the LDEQ Public Records Center, Room 1-127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of all supporting documents relative to this permitting action is available for review at the Ascension Parish Library- Gonzales Branch, 708 South Irma Boulevard, Gonzales, LA and the Iberville Parish Library-East Iberville Branch, 5715 Monticello Street, St. Gabriel, LA.

#### **D. WRITTEN COMMENT SUBMISSION**

Interested persons may submit written comments on this draft permit decision to the Administrative Authority, at the address listed below, no later than 12:30 p.m., on the closing date of the comment period.

All comments should include:

- (1) the name and address of the commentor,
- (2) a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
- (3) identification of the facility commented on (the EPA Identification Number and the AI Number), and
- (4) supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet), requests for a public hearing, and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to:

Ms. Soumaya Ghosn  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Toni Metoyer Booker  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Waste Permits Division  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-0956 or fax (225) 219-3158

### III. DESCRIPTION OF OVERALL SITE

Pioneer Americas, LLC, St. Gabriel facility, occupies approximately 60 acres along Highway 75 (River Road), approximately 0.5 miles south of St. Gabriel, Iberville Parish, Louisiana. The company manufactures chlorine, sodium hydroxide (caustic), and hydrogen through the electrolysis of brine. Pioneer purchased the St. Gabriel facility in 1988. Prior to Pioneer's ownership, the previous owner, Stauffer Chemicals, operated several surface impoundments containing elevated concentrations of sodium chloride brine, and traces of mercury. All of the impoundments were closed under closure plans approved by Department of Environmental Quality between 1981 and 1989.

### IV. HAZARDOUS WASTE FACILITIES

The surface impoundments were closed in accordance with the approved closure plan. Closure of the surface impoundments were completed between 1981 and 1989, and approved by the Department. This renewal post-closure permit will enable the performance of maintenance and groundwater monitoring activities on the permitted units.

### V. FINANCIAL ASSURANCE FOR POST-CLOSURE AND LIABILITY REQUIREMENTS

The applicant has provided a detailed, written estimate for annual costs of post-closure monitoring and maintenance of the facility in accordance with applicable post-closure regulations.

Pioneer Americas, LLC maintains an irrevocable letter of credit that satisfies the requirements of LAC 33:V.3711. In addition, Pioneer Americas must maintain a standby trust fund in accordance with the most recent post-closure cost estimate.

### VI. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED

Pursuant to La.R.S.30:2018.E.3, this draft hazardous waste post-closure permit is not subject to the requirements regarding environmental assessment statements or IT (See Save Ourselves v. Louisiana Environmental Control Commission 1152 (La. 1984)). Nevertheless the LDEQ has considered some factors similar to IT questions in preparing this draft permit.

#### A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.

Pioneer Americas, LLC has submitted its Part B Permit Renewal Application for the closed surface impoundment units at the St. Gabriel facility, which include seven surface impoundments. The impoundments were closed in place. Post-closure care, consisting of groundwater monitoring and corrective action is ongoing in accordance with State and Federal regulations. The design of the post-closure units and post-

closure requirements for the units are adequate to avoid potential and real adverse environmental impacts to the maximum extent possible.

**B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.**

There is no immediate environmental impact cost associated with the post-closure units addressed in this permit. The post-closure care program would mitigate any potential environmental impact. Because this permit addresses existing closed units, there will be neither positive nor negative economic effects associated with this application. Since there are no environmental impact costs associated with this application, there is no need to offset such costs.

**C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

**1. ALTERNATIVE PROJECTS**

This draft permit is for the post-closure of seven hazardous waste surface impoundments. There appears to be no known alternative projects that would offer more protection to the environment than issuing a post-closure permit for the closed units without unduly curtailing non-environmental benefits.

**2. ALTERNATIVE SITE**

This draft permit renewal is for an existing facility. The hazardous waste units will be permitted as post-closure units. The location of the units were determined by the previous locations of the operational units that were closed.

**3. MITIGATING MEASURES**

Pioneer Americas has instituted post-closure requirements for the closed units that are protective of human health and the environment. No mitigating measures would offer more protection to the environment than permitting the existing units without unduly curtailing non-environmental benefits.



# **PUBLIC PARTICIPATION**

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY**  
**DRAFT HAZARDOUS WASTE POST-CLOSURE RENEWAL PERMIT**

The LDEQ, Office of Environmental Services, is accepting written comments on a draft hazardous waste post-closure renewal permit for Pioneer Americas, LLC, Post Office Box 23, St. Gabriel, Louisiana 70776-0023 for the St. Gabriel facility. **The facility is located at 4205 Highway 75, in St. Gabriel, Iberville Parish.**

Pioneer Americas, LLC requested a renewal of the hazardous waste post-closure permit for the management and post-closure care of the Ponds 1-4, Sulfide Pond, North and South Surge Ponds. The facility is a site where corrective action is taking place to recover and remediate contaminated groundwater. Recovery wells pump contaminated groundwater to a waste recovery system where it is treated and discharged to a Publicly Owned Treatment Works (POTW). The hazardous waste unit involved in this permit action treated and disposed of hazardous waste generated at the site. The hazardous waste unit is currently closed and requires a permit to govern post-closure care.

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, September 10, 2007.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The draft hazardous waste post-closure renewal permit, fact sheet, the hazardous waste post-closure permit renewal application, and supporting documents are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).**

An additional copy may be reviewed at the Iberville Parish Library - East Iberville Branch, 5715 Monticello Street, St. Gabriel, LA 70776.

Inquiries or requests for additional information regarding this permit action should be directed to Toni Metoyer Booker, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-0956.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [deqmaillistrequest@la.gov](mailto:deqmaillistrequest@la.gov) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the draft hazardous waste post-closure renewal permit and associated information** can be viewed on the LDEQ permits public webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [www.doa.louisiana.gov/oes/listservpage/ldeq\\_pn\\_listserv.htm](http://www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm)

**All correspondence should specify AI Number 2644, Permit Number 062666540-PC-RN-1, and Activity Number PER20010001.**

**Scheduled Publication Date: July 19, 2007 in The Post South and July 20, 2007 in The Advocate**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

July 16, 2007

Via Fax (225) 388-0164

Ms. Susan Bush  
Legal Advertising  
The Advocate  
Post Office Box 588  
Baton Rouge, LA 70821-0588

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Ms. Bush:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in The Advocate *once only* on Friday, July 20, 2007. You will also receive a copy of the legal notice itself via email at [legal.ads@theadvocate.com](mailto:legal.ads@theadvocate.com).

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please contact Ms. Ambeau (225) 219-3277 or email [laura.ambeau@la.gov](mailto:laura.ambeau@la.gov).

The invoice for this public notice should be sent to:

Mr. David A. Gasper, Facility Contact  
Pioneer Americas, LLC, Saint Gabriel Facility  
Post Office Box 23  
4205 Highway 75  
Saint Gabriel, LA 70776-0023  
Phone (225) 642-1800

The official proof of publication in the form of a tear sheet should be mailed to my attention LDEQ, Environmental Assistance Division, P.O. Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura M. Ambeau  
Environmental Scientist, Public Participation Group

LA/Attachments/2

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

[WWW.DEQ.LOUISIANA.GOV](http://WWW.DEQ.LOUISIANA.GOV)

## VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published in the \_\_\_\_\_ (date of publication) edition of The Advocate:

Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001

THE ADVOCATE:

By: \_\_\_\_\_ Date: \_\_\_\_\_

Immediately upon publication please fax this form, along with a copy of the public notice as it appeared in the newspaper, to Ms. Laura Ambeau (225) 325-8157.

### PLEASE NOTE:

THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING OFFICIAL PROOF OF PUBLICATION, IN THE FORM OF A TEAR SHEET, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

July 16, 2007

Via Fax (225) 687-1814

Phone (225) 687-3288

Ms. Michelle Didier  
Legal Advertising  
The Plaquemine Post/South  
Post Office Box 589  
Plaquemine, LA 70765-0589

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Ms. Didier:

Please publish the attached legal notice regarding the above referenced facility as a regular legal ad in The Post South *once only* on Thursday, July 19, 2007. You will also receive a copy of the legal notice itself via email at [pscirculation@postsouth.com](mailto:pscirculation@postsouth.com).

State regulations require that we provide notification to the public and allow sufficient time for public comments. For this department to be assured that adequate notification is provided, we are requesting that you sign and date the enclosed 'Verification by Newspaper', and fax it to the attention of Ms. Laura Ambeau (225) 325-8157 immediately upon publication. If the notice cannot be published on the date requested, please contact Ms. Ambeau (225) 219-3277 or email [laura.ambeau@la.gov](mailto:laura.ambeau@la.gov).

The invoice for this public notice should be sent to:

Mr. David A. Gasper, Facility Contact  
Pioneer Americas, LLC, Saint Gabriel Facility  
Post Office Box 23  
4205 Highway 75  
Saint Gabriel, LA 70776-0023  
Phone (225) 642-1800

The official proof of publication in the form of a tear sheet should be mailed to my attention LDEQ, Environmental Assistance Division, P.O. Box 4313, Baton Rouge, LA 70821-4313.

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura M. Ambeau  
Environmental Scientist, Public Participation Group

LA/Attachments/2

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

[WWW.DEQ.LOUISIANA.GOV](http://WWW.DEQ.LOUISIANA.GOV)

## VERIFICATION BY NEWSPAPER

The undersigned verifies that the following public notice was published in the \_\_\_\_\_ (date of publication) edition of **The Post South**:

Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001

**THE POST SOUTH:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

Immediately upon publication please fax this form, along with a copy of the public notice as it appeared in the newspaper, to Ms. Laura Ambeau (225) 325-8157.

### PLEASE NOTE:

**THIS VERIFICATION DOES NOT RELIEVE THE NEWSPAPER OF THE RESPONSIBILITY OF PROVIDING OFFICIAL PROOF OF PUBLICATION, IN THE FORM OF A TEAR SHEET, TO THE LDEQ AS REQUESTED IN OUR COVER LETTER.**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

July 16, 2007

Via Fax (225)-231-1879

Phone (225)-335-0216

Mr. Mike Norwood

WJBO-AM

PO Box 14061

Baton Rouge, LA 70898-4061

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Mr. Norwood:

Please broadcast the enclosed public announcement regarding the above referenced facility *once only*, at around 7:00 am on Thursday, July 19, 2007. You will also receive a copy of the broadcast via email at [mikenorwood@clearchannel.com](mailto:mikenorwood@clearchannel.com).

The charges for this service should be billed to:

Mr. David A. Gasper, Facility Contact

Pioneer Americas, LLC, Saint Gabriel Facility

Post Office Box 23

4205 Highway 75

Saint Gabriel, LA 70776-0023

Phone (225) 642-1800

We are requesting that you sign and date the enclosed 'Verification by Radio Station', and fax it to the attention of Ms. Laura Ambeau at (225) 325-8157, as soon as the announcement has been broadcast.

If there is any problem with broadcasting this announcement in its entirety, or if you have any further questions, please contact Ms. Laura Ambeau immediately at (225) 219-3277 or via email at [laura.ambeau@la.gov](mailto:laura.ambeau@la.gov).

Thank you for assisting in our effort to serve the public.

Sincerely,

Laura M. Ambeau

Environmental Scientist, Public Participation Group

LA

Attachments/2

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

[WWW.DEQ.LOUISIANA.GOV](http://WWW.DEQ.LOUISIANA.GOV)



## VERIFICATION BY RADIO STATION

The undersigned verifies that the attached public announcement, associated with the public notice referenced below, was broadcast on WJBO-AM at \_\_\_\_\_ (time of day) on the \_\_\_\_\_ (day) of \_\_\_\_\_ (month), 2007.

**Re:     REQUEST FOR PUBLIC COMMENT ON THE  
          DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
          PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
          AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**WJBO-AM:**

**By: \_\_\_\_\_ Date: \_\_\_\_\_**

**Please complete and return this form to the address listed below promptly after broadcast of the public service announcement, or fax it to the attention of Laura Ambeau at (225) 325-8157.**

Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
Phone (225) 219-3277

**FAX (225) 325-8157**

**PUBLIC ANNOUNCEMENT  
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
DRAFT HAZARDOUS WASTE POST-CLOSURE PERMIT RENEWAL**

The LDEQ, Office of Environmental Services, is accepting written comments on the draft hazardous waste post-closure permit renewal (LAD 062 666 540-PC-RN-1) for Pioneer Americas, the Saint Gabriel Facility. **The facility is located at 4205 Highway 75, Saint Gabriel, Iberville Parish.**

This draft hazardous waste post-closure permit renewal governs the management and post-closure care of the Ponds 1-4, Sulfide Pond, North and South Surge Ponds. The hazardous waste unit is currently closed and requires a permit to govern post-closure care.

Written comments, written requests for a public hearing or written requests for notification of the final decision may be submitted to LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, September 10, 2007.**

The draft hazardous waste permitting action and related documents are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays).

A copy of the draft hazardous waste post-closure permit renewal is also available for review at the Iberville Parish Library, East Iberville Branch, 5715 Monticello Street, Saint Gabriel, LA.

More information is available in the notice published in The Plaquemine Post South on July 19, 2007 and The Advocate on July 20, 2007. You can also view the details of the notice on the LDEQ website.

Inquiries or requests for additional information regarding this permit action should be directed to the LDEQ Customer Service Center, phone (225) 219-LDEQ.

**All correspondence should specify AI2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, and Activity Tracking Number PER20010001.**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

**CERTIFIED MAIL 7003 2260 0005 9323 0464**  
**RETURN RECEIPT REQUESTED**

Mr. David A. Gasper  
Pioneer Americas, LLC  
P.O. Box 23  
St. Gabriel, LA 70776

RE: Pioneer Americas, LLC  
LAD 062 666 540-PC-RN-1  
Agency Interest # 2644 / PER20010001  
Draft Hazardous Waste Post-Closure Renewal Permit

Dear Mr. Gasper:

Attached please find your copy of the Pioneer Americas, LLC, Draft Hazardous Waste Post-Closure Renewal Permit, LAD062666540-PC-RN-1, which incorporates language pertaining to the post-closure care and maintenance of the Ponds 1-4, Sulfide Pond, North and South Surge Ponds at the Pioneer Americas, St. Gabriel Facility.

A comment period of forty-five (45) days will be allowed in order for the public to review and comment on this draft hazardous waste post-closure renewal permit. By request and if the Department finds a significant degree of public interest, a public hearing will also be scheduled at least forty-five (45) days after the date on which the public notice is given. The date, time and location of the public hearing, if requested, and specific dates for the beginning and ending of the comment period are contained in the attached public notice.

Prior to taking a final action on the final renewal permit, the Administrative Authority will consider all significant comments submitted on this action. Written comments must be submitted no later than 12:30 p.m. on the final day of the comment period. The issuance of the final permit decision is in accordance with LAC 33:V.705.

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

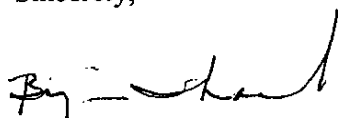
P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

Mr. David A. Gasper  
Pioneer Americas, LLC  
Page 2

Please reference your Agency Interest Number (2644), Permit Activity Number (PER20010001) and EPA ID Number (LAD062666540) on all future correspondence pertaining to this issue. Should you have any questions concerning this matter, please contact Ms. Toni Metoyer Booker of the Waste Services Section at (225) 219-0956.

Sincerely,



Bijan Sharafkhani, P.E.  
Administrator  
Waste Permits Division

tmb

Attachment

cc: Kishor Fruitwala, Ph.D., P.E. – EPA Region 6  
Chief, RCRA Facility Assessment (6PD-A)  
1445 Ross Avenue  
Dallas, Texas 75202

## **VERIFICATION BY FACILITY**

The undersigned verifies that the Pioneer Americas, LLC, Saint Gabriel Facility has received a copy of the draft hazardous waste post-closure permit renewal and public notice regarding:

**Re:    REQUEST FOR PUBLIC COMMENT ON THE  
        DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
        PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
        AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY**

**By: \_\_\_\_\_ Date: \_\_\_\_\_**

**Please complete and return this form promptly to the address listed below:**

**Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
Phone (225) 219-3277**

**FAX (225) 325-8157**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

July 17, 2007

Telephone (225) 642-8380

Fax (225) 642-8381

Lydia Haydel, Director  
Iberville Parish Library  
East Iberville Branch  
5715 Monticello Street  
St. Gabriel, LA 70776

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Ms. Haydel:

We request that the enclosed draft hazardous waste post-closure permit renewal and public notice for the referenced facility be made available for public review upon receipt. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax to (225) 325-8157.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call Ms. Ambeau at (225) 219-3277.

Sincerely,

Laura Ambeau  
Environmental Scientist, Public Participation Group

LA

Attachments/2

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

## **VERIFICATION BY LIBRARY**

The undersigned verifies that the Iberville Parish Library, East Iberville Branch, has received a copy of the draft hazardous waste post-closure permit renewal and public notice associated with the following facility:

**Re:     REQUEST FOR PUBLIC COMMENT ON THE  
          DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
          PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
          AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**IBERVILLE PARISH LIBRARY, EAST IBERVILLE BRANCH:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**Please complete and return this form promptly to the address listed below:**

Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
Phone (225) 219-3277

**FAX (225) 325-8157**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

July 17, 2007

Phone (225) 647-8924

Nate Stewart, Director  
Ascension Parish Library  
Gonzales Branch  
708 S. Irma Blvd.  
Gonzales, Louisiana 70737

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Mr. Stewart:

We request that the enclosed draft hazardous waste post-closure permit renewal and public notice for the referenced facility be made available for public review upon receipt. It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained during the permitting process. At the close of the permitting period, the Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ-OES), Permits Division, will provide written notice to you requesting that the information be removed.

Please complete the attached 'Verification by Library' and mail to Ms. Laura Ambeau, LDEQ-OES, Environmental Assistance Division, PO Box 4313, Baton Rouge, LA 70821-4313, or Fax to (225) 325-8157.

We appreciate your assistance in our efforts to serve the public. If you have any questions, please call Ms. Ambeau at (225) 219-3277.

Sincerely,

Laura Ambeau  
Environmental Scientist, Public Participation Group

LA

Attachments/2

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

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## **VERIFICATION BY LIBRARY**

The undersigned verifies that the Ascension Parish Library, Gonzales Branch, has received a copy of the draft hazardous waste post-closure permit renewal and public notice associated with the following facility:

**Re:     REQUEST FOR PUBLIC COMMENT ON THE  
          DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
          PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
          AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**ASCENSION PARISH LIBRARY, GONZALES BRANCH:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**Please complete and return this form promptly to the address listed below:**

Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
Phone (225) 219-3277

**FAX (225) 325-8157**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

July 17, 2007

225-687-3257

Jessel "Mitchell" Ourso, Parish President  
Iberville Parish Council  
58050 Meriam Street  
Plaquemine, LA 70565-0389

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Parish President Ourso:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the draft hazardous waste post-closure permit renewal and legal notice that is scheduled to be published in The Post South on July 19, 2007 and The Advocate on July 20, 2007.

Should you have any questions regarding the facility, additional permit information may be obtained from Ms. Toni M. Booker, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-0956.

Sincerely,

Laura M. Ambeau  
Environmental Scientist, Public Participation Group

LA

Enclosures/2

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

## **VERIFICATION BY PARISH GOVERNMENT**

The undersigned verifies that the Parish President, Iberville Parish Council has received a copy of the draft hazardous waste post-closure permit renewal regarding:

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**Iberville Parish Government:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**Please complete and return this form promptly to the address listed below:**

Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
PHONE (225) 219-3277

**FAX (225) 325-8157**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

July 17, 2007

Mr. Kishor Fruitwala  
U. S. EPA, Region VI  
1445 Ross Avenue, Suite 1200  
Mail Code: 6PDA  
Dallas, Texas 75202-2733

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your reference, a copy of the draft hazardous waste post-closure permit renewal and legal notice that is scheduled to be published in The Plaquemines Post South on July 19, 2007 and The Advocate on July 20, 2007.

Should you have any questions regarding the facility, additional permit information may be obtained from Ms. Toni M. Booker, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-0956.

Sincerely,

Laura Ambeau  
Environmental Scientist, Public Participation Group

LA  
Enclosures

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

## **VERIFICATION BY EPA**

The undersigned verifies that the EPA Region VI Office has received a copy of the draft hazardous waste post-closure permit renewal and public notice regarding:

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**EPA Region VI:** \_\_\_\_\_

**By:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Please complete and return this form promptly to the address listed below:**

Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
Phone (225) 219-3277

**FAX (225) 325-8157**



## DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO  
GOVERNOR

MIKE D. McDANIEL, Ph.D.  
SECRETARY

July 19, 2007

Phone: (225) 219-3600  
fax: (225) 219-3695

Mr. Bobby Mayweather  
Capital Regional Office  
602 North 5<sup>th</sup> Street  
Baton Rouge, La. 70821-4312

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

Dear Mr. Mayweather:

The Louisiana Department of Environmental Quality (LDEQ) is informing you of the draft hazardous waste post-closure permit renewal and legal notice that is scheduled to be published in The Post-South on July 19, 2007 and in The Advocate on July 20, 2007.

Should you have any questions regarding the facility, additional permit information may be obtained from Ms. Toni M. Booker, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-0956.

Sincerely,

Laura Ambeau  
Environmental Scientist, Public Participation Group

LA  
Enclosures

**ENVIRONMENTAL SERVICES**

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

## **VERIFICATION BY REGIONAL OFFICE**

The undersigned verifies that the Capital Regional Office has received a copy of the draft hazardous waste operating permit renewal and public notice regarding:

**Re:   REQUEST FOR PUBLIC COMMENT ON THE  
      DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
      PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
      AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**Capital Regional Office:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**Please complete and return this form promptly to the address listed below:**

Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
Phone (225) 219-3277  
  
**FAX (225) 325-8157**

## **VERIFICATION FOR DELIVERY OF MATERIAL TO BE SCANNED**

**THIS INFORMATION IS EXPECTED TO BE AVAILABLE ON EDMS  
48 HOURS FROM THE DELIVERY DATE**

**Public Notice Date: Thursday, July 19, 2007**

The undersigned verifies that a copy of the draft hazardous waste post-closure permit renewal for the referenced facility has been received by the First Floor Scanning Center:

**Re: REQUEST FOR PUBLIC COMMENT ON THE  
DRAFT HAZARDOUS WASTE POST CLOSURE PERMIT RENEWAL  
PIONEER AMERICAS, LLC, SAINT GABRIEL FACILITY  
AI NUMBER 2644, PERMIT NUMBER LAD 062 666 540-PC-RN-1, PER20010001**

**FIRST FLOOR SCANNING CENTER:**

The Material Was Delivered:

By: \_\_\_\_\_ Date: \_\_\_\_\_  
Time \_\_\_\_\_

.....

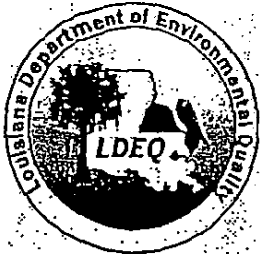
The Public Participation Group contact for this packet of information is  
Laura Ambeau, Rm. 321-31, 2-3277



# **PART A**

# **APPLICATION**

MB#: 2050-0175

<b>MAIL</b> <b>COMPLETED FORM</b> <b>TO:</b> LDEQ/OES/ Environmental Assistance Division/CAS PO Box 4313 Baton Rouge, LA 70821-4313	United States Environmental Protection Agency and <b>STATE OF LOUISIANA</b> <b>DEPARTMENT OF ENVIRONMENTAL QUALITY</b> <b>NOTIFICATION OF HAZARDOUS WASTE ACTIVITY</b> <b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b>		
<b>Reason for Submittal</b>  <b>CHOOSE ONLY ONE REASON PER SUBMITTAL</b>	<b>A. Reason for Submittal:</b> <input type="checkbox"/> To provide initial notification (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities). <input type="checkbox"/> To provide subsequent notification (to update site identification information). or <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____). or <input type="checkbox"/> As a component of the Hazardous Waste Report.		
<b>Site EPA ID Number</b>	<b>B. Number of Employees:</b> 83 Pioneer employees & 50 Resident Contract Employees EPA ID Number: LAD062666540		
<b>Site Name</b>	Legal Name: Pioneer Americas LLC		
<b>Site Location</b> Physical address, or PO Box or Route)	Street Address: 4205 Highway 75 City, Town, or Village: SL Gabriel      State: Louisiana County/Parish Name: Iberville      Zip Code: 70776-0023		
<b>Site Land Type</b>	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
<b>North American Industry Classification System (NAICS) Code(s)</b>	A. 325181      B. _____ C. _____      D. _____		
<b>Site Mailing Address</b>	Street or P. O. Box: PO Box 23 City, Town, or Village: SL Gabriel State: Louisiana County/Parish Name: Iberville      Zip Code: 70776-0023		
<b>Site Contact Person</b>	First Name: Regina      MI: L      Last Name: Wilson Phone Number: 225-642-1863      Phone Number Extension:		
<b>Legal Owner and Operator of the Site (see instructions)</b>	A. Name of Site's Legal Owner: Pioneer Americas LLC      Date Became Owner (mm/dd/yyyy): 12/25/1988 Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other B. Name of Site's Operator: Pioneer Americas LLC      Date Became Operator (mm/dd/yyyy): 12/25/1988 Operator Type: <input type="checkbox"/> Private <input type="checkbox"/> County/Parish <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

OMB#: 2050-0175

EPA ID No. L A D D 6 9 5 2 4 9 8 1

Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes)

Hazardous Waste Activities

1. Generator of Hazardous Waste

(Select one of the following categories)

☒ a. LQG: Greater than 1,000 kg/mo (2,200 lbs.)  
Non-acute hazardous waste; or

☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs.)  
Non-acute hazardous waste; or

☐ c. CESQG: Less than 100 kg/mo  
Non-acute hazardous waste

☐ d. NON-GENERATOR

In addition, indicate other generator activities (check all that apply)

☐ e. United States Importer of Hazardous Waste

☐ f. Mixed Waste (hazardous and radioactive) Generator

For Items 2 through 6, check all that apply:

☐ 2. Transporter of Hazardous Waste

☐ Transfer Facility Status  
(Transporter status must be indicated above)

☐ 3. Treater, Storer, or Disposer of HW (at your site)  
Note: A hazardous waste permit is required for this activity.

☐ Permitted ☐ Interim Status ☐ Proposed

☒ 4. Recycler of Hazardous Waste (at your site)  
Note: A hazardous waste permit may be required for this activity.

5. Exempt Boiler and/or Industrial Furnace

☐ a. Small Quantity On-site Burner Exemption  
☐ b. Smelting, Melting, Refining Furnace Exemption

☐ 6. Underground Injection Control

B. Universal Waste Activities (Indicate Activity Type)

☐ 1. Large Quantity Handler of Universal Waste [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. (check all boxes that apply):

	Generated	Accumulated
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Antifreeze	<input type="checkbox"/>	<input type="checkbox"/>

☐ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities (Indicate Activity Type)

☐ 1. Used Oil Transporter

☐ a. Transporter  
☐ b. Transfer Facility

☐ 2. Used Oil Processor and/or Re-refiner

☐ a. Processor  
☐ b. Re-refiner

☐ 3. Off-Specification Used Oil Burner

☐ 4. Used Oil Fuel Marketer

☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner  
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

☐ 5. Used Oil Fuel Burner  
(Indicate Combustion Device(s))

☐ Utility Boiler ☐ Industrial Boiler ☐ Industrial Furnace

1. Description of Hazardous Wastes

Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

D01	D002	D003	D009	D0035	F003	F005
71	K106	P096				

EPA ID No.

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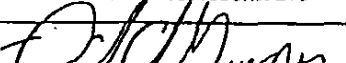
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**T**

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[illegible][illegible]

Signature of owner, operator, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm-dd-yyyy)
	David A. Gasper, Plant Manager for Pioneer Americas LLC, St. Gabriel Louisiana Plant	10/06/07

OMB #: 2050-0034 Expires 10/31/02

United States Environmental Protection Agency  
HAZARDOUS WASTE PERMIT INFORMATION FORM

1. Facility Permit Contact (See Instructions on page 35)	First Name: Regina	MI: L.	Last Name: Wilson
	Phone Number: 225-642-1863		Phone Number Extension:
2. Facility Permit Contact Mailing Address (See Instructions on page 35)	Street or P.O. Box: PO Box 23		
	City, Town, or Village: St. Gabriel		
	State: Louisiana		
	Country: United States	Zip Code: 70776	
3. Legal Owner Mailing Address and Telephone Number (See Instructions on page 36)	Street or P.O. Box: 4300 NCNB BLDG 700 Louisiana		
	City, Town, or Village: Houston		
	State: Texas		
	Country: United States	Zip Code: 77002	Phone Number: 713-225-3831
4. Operator Mailing Address and Telephone Number (See Instructions on page 36)	Street or P.O. Box: PO Box 23		
	City, Town, or Village: St. Gabriel		
	State: Louisiana		
	Country: United States	Zip Code: 70776	Phone Number:
5. Facility Existence Date (See Instructions on page 36)	Facility Existence Date (mm/dd/yyyy): 12/26/1970		

6. Other Environmental Permits (See Instructions on page 36)

A. Permit Type (Enter code)	B. Permit Number	C. Description
N R E	LA0005231 LAD062666540 1280-00011-02	State LPDES Permit State RCRA Post-Closure Permit State Air Permit

Nature of Business (Provide a brief description; see Instructions on page 37)

Production of chlorine and sodium hydroxide by electrolysis  
of brine using the mercury cell process

# Process Codes and Design Capacities (See Instructions on page 37)

**A. PROCESS CODE** - Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 9.

**B. PROCESS DESIGN CAPACITY** - For each code entered in column A, enter the capacity of the process.

**1. AMOUNT** - Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

**2. UNIT OF MEASURE** - For each amount entered in column B(1), enter the code in column B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

**C. PROCESS TOTAL NUMBER OF UNITS** - Enter the total number of units for each corresponding process code.

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
D79	Disposal	Gallons; Liters; Gallons Per Day; or Liters Per Day	T81	Compost Kilo	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D80	Landfill	Acres-feet; Backsters-meters; Acres; Cubic Meters; Backsters Cubic Yards	T82	Lime Kilo	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D81	Land Treatment	Acres or Backsters	T83	Aggregate Kilo	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D82	Open Disposal	Gallons Per Day or Liters Per Day	T84	Phosphate Kilo	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D83	Surface Impoundment Disposal	Gallons; Liters; Cubic Meters; or Cubic Yards	T85	Coke Oven	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
D89	Other Disposal	Any Unit of Measure Listed Below	T86	Blas Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S81	Storage	Any Unit of Measure Listed Below	T87	Smelting, Melting, or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S82	Containment	Gallons; Liters; Cubic Meters; or Cubic Yards	T88	Titanium Dioxide	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S83	Tank Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T89	Chloride Oxidation Reactor	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S84	Waste Pile	Cubic Yards or Cubic Meters	T90	Methane Reforming Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S85	Surface Impoundment Storage	Gallons; Liters; Cubic Meters; or Cubic Yards	T91	Pulping Liquor Recovery Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S86	Drip Pad	Gallons; Liters; Acres; Cubic Meters; Backsters; or Cubic Yards	T92	Combustion Device Used in The Recovery Of Sulfur Values From Spent Sulfuric Acid	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S87	Containment Building Storage	Cubic Yards or Cubic Meters	T93	Baleage Acid Furnaces	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
S99	Other Storage	Any Unit of Measure Listed Below	T94	Other Industrial Furnaces Listed in 48 CFR 258.10	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
T81	Tank Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	T95	Containment Building - Treatment	Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T82	Surface Impoundment Treatment	Gallons Per Day; Liters Per Day; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	X81	Miscellaneous (Subpart X)	Any Unit of Measure Listed Below
T83	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour	X82	Open Burning/Open Detonation	Any Unit of Measure Listed Below
T84	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour	X83	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; or Metric Tons Per Hour
T89	Boiler	Gallons; Liters; Gallons Per Hour; Liters Per Hour; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour	X84	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; Short Tons Per Hour; Kilograms Per Hour; Liters Per Hour; Kilograms Per Hour; or Million Btu Per Hour
			X85	Geologic Repository	Cubic Yards; Cubic Meters; Acres-feet; Backsters-meters; Gallons; or Liters
			X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	H	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	A
Gallons Per Hour	L	Metric Tons Per Day	S	Acres-feet	A
Gallons Per Hour	M	Pounds Per Hour	J	Backsters	B
Liters Per Day	V	Kilograms Per Hour	R	Backsters-meters	F
		Million Btu Per Hour	X	Btu Per Hour	I

# Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 531,788 gallons.

Line Number	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
		(1) Amount (Specify)	(2) Unit of Measure (Enter code)		
X 1	S 0 2	5 3 1 . 7 8 8	G	0 0 1	For Official Use Only
1		Not applicable. All units are currently in the post-closure period. See Table 1 of the permit renewal application for a list of units, hazardous wastes contained in the closed units, and processes used when the units were operational.			
2					
3					
4					
5					
6					
7					
8					
9					
1 0					
1 1					
1 2					
1 3					

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

Other Processes (See instructions on page 37 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

N/A

Line Number (Enter 1s in sequence with Item 8)	A. Process Code (From list above)	B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
		(1) Amount (Specify)	(2) Unit of Measure (Enter code)		
X 1	T 0 4				In-situ Vitrification
1					
2					
3					
4					

## Description of Hazardous Wastes (See Instructions on page 37)

- A. EPA HAZARDOUS WASTE NUMBER - Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY - For each listed waste entered in column A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE - For each quantity entered in column B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

*If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.*

#### D. PROCESSES

**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate the waste will be stored, treated, and/or disposed at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Items 8A and 9A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:**

1. Enter the first two as described above.
2. Enter "000" in the extreme right box of Item 10.D(1).
3. Use additional sheet, enter the number from previous sheet, and enter additional code(s) in Item 10.E

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in Item 10.D(2) or in Item 10.E(2).

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.
3. Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING Item 10 (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are 'corrosive only' and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.**

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES			
				(1) PROCESS CODES (Enter code)			(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X 1	K 0 5 4	900	P	T 0 3	D 8 0		
X 2	D 0 0 2	400	P	T 0 3	D 8 0		
	D 0 0 1	100	P	T 0 3	D 8 0		
4	D 0 0 2						Included With Above



OMB #: 2050-0034 Expires 10/31/02

Description of Hazardous Wastes (Continued; use additional sheets as necessary)

See Table 1

Line Number	A. EPA Hazardous Waste No. (Enter code)	B. Estimated Annual Quantity of Waste	C. Unit of Measure (Enter code)	D. PROCESSES			
				(1) PROCESS CODES (Enter code)			(2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1							
2							
3							
4							
5							
6							
7							
8							
9							
1 0							
1 1							
1 2							
1 3							
1 4							
1 5							
6							
7							
1 8							
1 9							
2 0							
2 1							
2 2							
2 3							
2 4							
2 5							
2 6							
2 7							
2 8							
2 9							
3 0							
3 1							
3 2							
3 3							

OMB #: 2050-0034 Expires 10/31/02

Map (See Instructions on page 38)

See Figures 1-3

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

12. Facility Drawing (See Instructions on page 39)

See Figure 3

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

13. Photographs (See Instructions on page 39)

See Appendix E

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

14. Comments (See Instructions on page 39)

# **SIGNATURE PAGE**

**DRAFT   LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY   DRAFT****HAZARDOUS WASTE POST-CLOSURE RENEWAL PERMIT**

**PERMITTEE:**                    **PIONEER AMERICAS, LLC**

**PERMIT NUMBER:**        **LAD 062 666 540-PC-RN-1**  
                                 **Agency Interest # 2644/Activity # PER20010001**

**FACILITY LOCATION:**   **4205 Highway 75**  
                                 **IBERVILLE PARISH**  
                                 **ST. GABRIEL, LOUISIANA 70776**

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder, and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to Pioneer Americas, LLC, (hereafter referred to as the "permittee"), for the facility located at St. Gabriel, Iberville Parish, Louisiana, latitude 30° 14' 30" N and longitude 91° 06' 31" W.

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the LDEQ, or his/her designee.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions set forth herein, and the applicable regulations contained in the Louisiana Administrative Code, Title 33, Part V, Subpart 1, (LAC 33:V.Subpart 1). Applicable regulations are those that are in effect on the date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The permittee must inform the LDEQ of any deviation from or changes in the information in the application that would affect the permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of \_\_\_\_\_, and shall remain in effect until \_\_\_\_\_, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Post-closure requirements of LAC 33:V. Subchapter B must continue for at least thirty (30) years after the date of closure for those units listed in Section III.O.1 of this permit. Expiration of this permit does not relieve the permittee of the responsibility to reapply for a permit for the remainder of the thirty (30) year post-closure care period.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the Secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality  
Office of the Secretary  
Attention: Hearings Clerk, Legal Services Division  
P. O. Box 4302  
Baton Rouge, LA 70821-4302

DRAFT

\_\_\_\_\_  
Chuck Carr Brown Ph.D., Assistant Secretary  
Louisiana Department of Environmental Quality

\_\_\_\_\_  
Date

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#### LIST OF ATTACHMENTS

ATTACHMENT 1 ..... LIST OF FACILITY DOCUMENTS



# **BODY OF PERMIT**

**DRAFT**  
**HAZARDOUS WASTE POST-CLOSURE RENEWAL PERMIT**

**PIONEER AMERICAS, INC.**  
**EPA ID# LAD 062666540**  
**St. Gabriel, Louisiana**  
**Iberville Parish**

**Agency Interest # 2644**  
**PER20010001**  
**PERMIT # LAD 062666540 PC-RN -1**

**I. PERMIT PREAMBLE**

This permit is issued to Pioneer Americas, LLC, St. Gabriel, Iberville Parish, Louisiana, LAD 062 666 540 (from hereafter referred to as the permittee) by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., and the regulations adopted thereunder.

For the purposes of the permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. seq., and the regulations adopted thereunder.

## GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

**“Administrative Authority”** means the Louisiana Department of Environmental Quality (LDEQ).

**“Application”** refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

**“Area of Concern” (AOC)** means any discernable unit or area which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly-identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

**“Area of Investigation” (AOI)** is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

**“Beneficial Resource”** describes natural resources that are useful to human and ecological receptors. The state may establish statutes or regulations that identify certain environmental components, such as specific ground water or surface water sources, as a “Special Beneficial Resource,” or “Designated Beneficial Resource.” The beneficial resources then may be entitled to greater protection from contamination.

**“Constituents of Concern” (COC)** means the COPC’s that pose a significant risk.

**“Constituents of Potential Concern” (COPC)** means chemicals from hazardous waste and hazardous waste constituents that are potentially site related and have data of quality for use in the Screen or a site-specific risk assessment. The facility should compile a list of COPC’s for each release site based on existing sampling data, waste analysis reports, etc.

**“Conceptual Site Model” (CSM)** is part of the Data Quality Objective (DQO) process that presents a three-dimensional picture of site conditions at a discrete point in time that conveys what is known about the facility, releases, release mechanisms, contaminant fate and transport, exposure pathways, potential receptors, and risks. The information for the CSM is documented into six profiles. The CSM evolves as data gaps in the profiles become more complete, and will be refined based upon results of site characterization data. The final CSM is documented in the Risk Management Plan (RMP).

**“CWA”** means Clean Water Act.

**“Corrective Action”** is an activity conducted to protect human health and the environment.

**“DNAPL”** (Dense Non-Aqueous Phase Liquid) a dense liquid not dissolved in water, commonly referred to as “free product.”

**“Department”** means the Louisiana Department of Environmental Quality (LDEQ).

**“EPA”** means the United States Environmental Protection Agency.

**“HSWA”** means the 1984 Hazardous and Solid Waste Amendments to RCRA.

**“Hazardous Constituent”** means any constituent identified in LAC 33:V.Chapter 31. Table 1, or any constituent identified in LAC 33:V.3325. Table 4.

**“LDEQ”** means the Louisiana Department of Environmental Quality.

**“LNAPL”** (Light Dense Non-Aqueous Phase Liquid) a light liquid not dissolved in water, commonly referred to as “free product.”

**“Operating Record”** means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. A minimum list of documents that must be included in the operating record are identified at LAC 33:V.1529.B.

**“Permittee”** means Pioneer Americas, LLC, 4205 Highway 75, St. Gabriel, Louisiana 70776.

**“RCRA Permit”** means the full permit, with RCRA and HSWA portions.

**“RFA”** means RCRA Facility Assessment.

**“RFI”** means RCRA Facility Investigation.

**“Release”** means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

**“SARA”** means Superfund Amendments and Reauthorization Action of 1986.

**“Solid Waste Management Unit” (SWMU)** means any discernable unit at which solid wastes have been placed at any time, *irrespective of whether the unit was intended for the management of solid or hazardous waste*. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

"Stabilization" is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to the "Glossary of Terms".

All regulating citations are defined as being the regulations in effect on the date of issuance of this permit. New and/or amended regulations are not included as Permit requirements until permit modification procedures as specified in Condition II.C. of the permit and LAC 33:V.321 are completed.

## **II. GENERAL PERMIT CONDITIONS**

### **II.A. DURATION OF PERMIT**

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

### **II.B. EFFECT OF PERMIT**

This permit authorizes the Permittee to conduct post-closure care activities associated with the North Surge Pond, South Surge Pond, Sulfide Pond, Sludge Ponds 1, 2, 3, and 4 in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, or under Section 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

### **II.C. PERMIT ACTIONS**

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulation, or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

## **II.D. SEVERABILITY**

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

## **II.E. DUTIES AND REQUIREMENTS**

### **II.E.1. Duty to Comply**

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart I and the Environmental Quality Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

### **II.E.2. Duty to Reapply**

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

### **II.E.3. Permit Extension**

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

### **II.E.4. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### **II.E.5. Duty to Mitigate**

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

**II.E.6. Proper Operation and Maintenance**

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

**II.E.7. Duty to Provide Information**

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit.

**II.E.8. Inspection and Entry**

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- II.E.8.a. enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;
- II.E.8.b. have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;
- II.E.8.c. inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and
- II.E.8.d. sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.



## **II.E.9. Sample Monitoring and Records**

**II.E.9.a.** Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method.

### **II.E.9.b. Records of monitoring information shall include:**

**II.E.9.b.(1)** the date, exact place, and time of sampling or measurements;

**II.E.9.b.(2)** the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;

**II.E.9.b.(3)** the date(s) analyses were performed;

**II.E.9.b.(4)** the name(s) and signature(s) of the individual(s) who performed the analyses;

**II.E.9.b.(5)** the analytical techniques or methods used;

**II.E.9.b.(6)** the results of such analyses; and

**II.E.9.b.(7)** associated quality assurance performance data.

### **II.E.9.c. Laboratory Quality Assurance/Quality Control**

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

**II.E.9.c.(1)** any commercial laboratory providing analytical results and test data to the Department required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

LAC 33:I. Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website: <http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx>.

In accordance with LAC 33:I.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the Department;
- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or
- otherwise required by the Department regulations.

This includes, but is not limited to data from RCRA Title Burns, Risk Burns, Risk Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

**II.E.9.c.(2)** If the Permittee decides to use their own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document and submit for approval, quality assurance/quality control procedures that are commensurate with requirements in LAC 33:I.Subpart 3. Laboratory Accreditation.

**II.E.9.c.(3)** For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

**II.E.10. Retention of Records**

The Permittee shall maintain records from all ground water monitoring wells and associated groundwater surface elevations for the active life of the facility and for the post-closure care period.

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C.

File copies shall be kept for LDEQ inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

**II.E.11. Notices of Planned Physical Facility Changes**

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

**II.E.12. Physical Facility after Modification**

For a closed unit being modified, the Permittee may not manage hazardous waste in the modified portion of the closed unit until:

- II.E.12.a. the Permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and
- II.E.12.b. the Administrative Authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

**II.E.13. Anticipated Noncompliance**

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

**II.E.14. Transfer of Permits**

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.

**II.E.15. Compliance Schedules**

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date.

**II.E.16. Noncompliance Reporting**

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit that may endanger human health or the environment, except where more immediate notification is required by LAC 33:1.3901, et seq. ("Notification Regulation and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended.) This report shall include the following:

**II.E.16.a.** information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

**II.E.16.b.** information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

**II.E.16.b.(1)** name, address, and telephone number of the owner or operator;

**II.E.16.b.(2)** name, address, and telephone number of the facility;

**II.E.16.b.(3)** date, time, and type of incident;

**II.E.16.b.(4)** name and quantity of materials involved;

**II.E.16.b.(5)** the extent of injuries, if any;

II.E.16.b.(6) an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

II.E.16.b.(7) estimated quantity and disposition of recovered material that resulted from the incident.

**II.E.17. Follow-up Written Report of Noncompliance**

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment. However, where more immediate submission is required by LAC 33:I.3901, "Notification Regulations and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended, the report shall be submitted in accordance with those regulations. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee submits a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

**II.E.18. Other Noncompliance**

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.16. above.

**II.E.19. Other Information**

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information.

**II.E.20. Signatory Requirement**

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

**II.E.21. Schedule of Compliance**

The Permittee shall submit for review and approval by the Administrative Authority, the following items:

- II.E.21.a.** Within sixty (60) days of the effective date of this permit, a site-specific workplan for a background investigation for sodium, magnesium, and calcium.
- II.E.21.b.** Within sixty (60) days of the effective date of this permit, a workplan for source identification and/or site delineation of relevant constituents of concern, including barium and chlorides.
- II.E.21.c.** Within sixty (60) days of the effective date of this permit, Sampling Analysis Plan that includes a Statistical Analysis Plan and a Groundwater Monitoring Summary Table that reflects Condition VI.D. Table 1, to detail methods and approaches for the evaluation of monitoring parameters to be followed for the Site-Specific Background Investigation.

**II.E.22. Additional Operating Standards**

(RESERVED)

**II.E.23. Updated Documents To Be Submitted Prior To Operation**

(RESERVED)

**II.E.24. Documents To Be Maintained at Facility Site**

**II.E.24.a.** Until post-closure is completed and certified by an independent registered professional engineer, the Permittee shall maintain at the facility the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

**II.E.24.a.(1)** Waste Analysis Plan submitted in accordance with LAC 33:V.1519 (see Attachment 1).

**II.E.24.a.(2)** Personnel Training Plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

**II.E.24.a.(3)** Contingency Plan submitted in accordance with LAC 33:V.1513 (see Attachment 1).

II.E.24.a.(4) Arrangements with local authorities in accordance with LAC 33:V.1511.G. (see Attachment I).

II.E.24.a.(5) Post-Closure Plan submitted in accordance with LAC 33:V.3523 and any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523. (see Attachment I).

II.E.24.a.(6) Cost estimate for facility post-closure care submitted in accordance with LAC 33:V.3709 and any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment I).

II.E.24.a.(7) Operating records plan as required by LAC 33:V.1529.

II.E.24.a.(8) Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B. (see Attachment I)

II.E.24.b. All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

#### II.E.25. Annual Report

An annual report shall be submitted covering all hazardous waste units and their activities during the previous calendar year as required by LAC 33:V.1529.D.

#### II.E.26. Manifest

The Permittee shall report manifest discrepancies and unmanifested waste as required by LAC 33:V.309.L.8 and 9.

#### II.E.27. Emissions

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

**II.E.28. Waste Discharges**

Waste discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

**II.E.29. Non-Listed Hazardous Waste Facilities**

This permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Closed Facilities). If the Permittee determines that an unpermitted hazardous waste facility exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.19 of the General Permit Conditions.

**II.E.30. Compliance With Land Disposal Restrictions**

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit (Conditions VII and VIII).

**II.E.31. Establishing Permit Conditions**

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

**II.E.32. Obligation for Corrective Action**

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII of this permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

**II.E.33. Attachments and Documents Incorporated by Reference**

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.



If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

### **III. GENERAL POST-CLOSURE CONDITIONS**

#### **III.A. DESIGN AND OPERATION OF THE POST-CLOSURE UNIT**

- III.A.1.** The Permittee must maintain all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.
- III.A.2.** The Permittee must not manage any new wastes in the Post-Closure units listed in Condition IV of this permit.

#### **III.B. REQUIRED NOTICE**

(RESERVED)

#### **III.C. GENERAL WASTE ANALYSIS**

The Permittee shall follow the procedures described in the Waste Analysis Plan (Attachment 1) and in accordance with LAC 33:V.1519.

- III.C.1.** The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority, in the annual report, whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.
- III.C.2.** If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and recharacterize all hazardous waste streams generated by the Permittee onsite and treated, stored or disposed onsite. The Permittee must recharacterize wastes in accordance with LAC 33:V.1519.A.3. This recharacterization shall include laboratory analyses which provide information needed to properly treat, store and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this recharacterization shall be summarized in the Permittee's Annual Report.
- III.C.3.** The Permittee shall submit documentation or certification if the Permittee contracts with an outside laboratory for any service required by the Waste Analysis Plan or LAC 33:V.Chapter 15. This documentation or certification shall be resubmitted when a different laboratory is contracted. The Permittee shall also submit

documentation that the laboratory complies with the accreditation requirements of LAC 33:I.Chapter 45.

- III.C.4.** In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all the sampling and QA/QC procedures of Condition II.E.9. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the Administrative Authority upon request.

**III.D. SECURITY**

The Permittee must comply with the security provisions of LAC 33:V.1507.

**III.E. GENERAL INSPECTION REQUIREMENTS**

The Permittee must follow the Inspection Plan referenced in Condition II.E.24.a.(8) and Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509.A and B, and 3523.B.

**III.F. PERSONNEL TRAINING**

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The training shall follow the outline referenced in Attachment 1. The Permittee must maintain all training documents and records as required by LAC 33:V. 1515.D and E.

**III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE**

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

**III.H. LOCATION STANDARDS**

- III.H.1.** The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

- III.H.2.** The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by LDEQ

prior to any hazardous waste and/or hazardous waste units being placed thereon.

### **III.I. PRECIPITATION RUN-ON AND RUN-OFF**

The Permittee must provide for the control by diversion or treatment of run-on and run-off resulting from a rainfall of at least twelve (12) inches, occurring during a period of twenty-four (24) hours in conformity with locally available records of a twenty-four (24) hour rainfall as per LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.2911.

### **III.J. HURRICANE EVENTS**

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

### **III.K. PREPAREDNESS AND PREVENTION**

#### **III.K.1. Required Equipment**

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

#### **III.K.2. Testing and Maintenance of Equipment**

The Permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

#### **III.K.3. Access to Communications or Alarm Systems**

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

#### **III.K.4. Arrangements with Local Authorities**

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

**III.L. CONTINGENCY PLAN****III.L.1. Implementation of Plan**

The Permittee must immediately carry out the provisions of the Contingency Plan, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

**III.L.2. Copies of Plan**

The Permittee must comply with the requirements of LAC 33:V.1513.C.

**III.L.3. Amendments to Plan**

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

**III.L.4. Emergency Coordinator**

The Permittee must comply with the requirements of LAC 33:V.1513.E, and 322.B.6 concerning the emergency coordinator.

**III.M. MANIFEST SYSTEM**

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 9 and 11.

**III.N. RECORD KEEPING AND REPORTING****III.N.1. Operating Record**

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C.

**III.N.2. Annual Report**

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

**III.N.3. Operations Manual**

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's treatment, storage and disposal facilities.

### **III.O. POST-CLOSURE**

#### **III.O.1. Post-Closure Care**

The Permittee must manage the North Surge Pond, South Surge Pond, Sulfide Pond, Sludge Ponds 1, 2, 3, and 4, in accordance with this permit, LAC 33:V. Chapter 35, Subchapter B and 2911.

#### **III.O.2. Amendment to Post-Closure Permit**

The Permittee must request modification to this post-closure permit when necessary, in accordance with LAC 33:V.3523.D. and LAC 33:V.321.

#### **III.O.3. Post-Closure Maintenance**

After final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, including maintenance and monitoring throughout the post-closure care period specified in the permit under LAC 33:V.3521.A.1. The Permittee must maintain all units in post-closure according to the requirements in Condition V.B.

#### **III.O.4. Post-Closure Restrictions**

The Administrative Authority may require, at partial and final closure, continuation of any of the security requirements of LAC 33:V.1507, during part or all of the post-closure care period when access by the public or domestic livestock may pose a hazard to human health.

#### **III.O.5. Post-Closure Property or Site Use**

**III.O.5.a.** Post-closure use of property on or in which hazardous wastes remain after partial or final closure must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of the containment system, or the function of the permitted closed unit's monitoring systems, unless the Administrative Authority finds that the disturbance:

**III.O.5.a.i.** is necessary to the proposed use of the property, and will not increase the potential hazard to human health or the environment; or

**III.O.5.a.ii.** is necessary to reduce a threat to human health or the environment.

**III.O.5.b.** Any post-closure activity other than that specified in this permit must have prior approval of the Administrative Authority.

**III.O.6. Post-Closure Contact**

The Permittee must provide the name, address, and phone number of the person or office to contact about the permitted post-closure units during the post-closure care period.

**III.O.7. Certification of Completion of Post-Closure Care**

No later than sixty (60) days after completion of the established post-closure care period for the specified unit, the Permittee must submit to the Administrative Authority, by registered mail, a certification that the post-closure care period for the hazardous waste disposal unit(s) was performed in accordance with the specifications in the approved post-closure plan. The certification must be signed by the Permittee and an independent registered professional engineer. Within 60 days after receipt of the certification the Administrative Authority will notify the owner or operator that he is no longer required to maintain financial assurance for post-closure care of that unit, unless the Administrative Authority has reason to believe that post-closure care was not conducted in accordance with the approved post-closure plan.

The certification of post-closure care shall include the certification statement found in the LAC 33:V.513.A or the current certification statement in the Louisiana hazardous waste regulations at the time of completion of post-closure care.

**III.P. COST ESTIMATE FOR CARE OF THE POST-CLOSURE UNIT**

- III.P.1.** The Permittee must maintain a cost estimate for the permitted and associated structures as required by LAC 33:V.3709.
- III.P.2.** The Permittee must maintain and adjust the post-closure cost estimate for inflation, as specified in LAC 33:V.3709.B, C, D, and for other circumstances that increase the cost of post-closure.
- III.P.3.** The Permittee must base all post-closure cost estimates on the assumption that a third party contractor performs post-closure monitoring and maintenance in accordance with LAC 33:V.3709.A.
- III.P.4.** The Permittee must consider the inventory and process conditions and their impact on the post-closure cost estimate for any resubmittal.
- III.P.5.** During the life of the facility, the Permittee must keep, at the facility, its latest post-closure cost estimates, as necessary, to comply with LAC 33:V.3709.D.

**III.P.6.** Throughout the active life of the facility, the Permittee must adjust and revise its post-closure cost estimates, as necessary, to comply with the provisions of LAC 33:V.3709.

### **III.Q. FINANCIAL ASSURANCE FOR THE POST-CLOSURE UNIT**

Throughout the post-closure care period, the Permittee must provide updates for its financial assurance mechanisms, as necessary, to comply with the provisions of LAC 33:V.3711.

### **III.R. LIABILITY REQUIREMENTS**

(RESERVED)

### **III.S. INCAPACITY OF THE PERMITTEE**

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

### **III.T. POST-CLOSURE NOTICES**

If the Permittee or any subsequent Permittee of the land upon which this hazardous waste disposal unit is located wishes to remove hazardous wastes and hazardous waste residues, the liner or contaminated soils, he must request a modification to the post-closure permit in accordance with the applicable requirements in LAC 33:V, Chapters 3 and 7. The Permittee must demonstrate that the removal of hazardous wastes will satisfy the criteria of LAC 33:V.3521. By removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable requirements of LAC 33:V, Subpart 1. If he is granted a permit modification or otherwise granted approval to conduct such removal activities, the Permittee may request that the Administrative Authority approve either:

- III.T.1.** the removal of the notation on the deed to the facility property or other instrument normally examined during title search; or
- III.T.2.** the addition of a notation to the deed or instrument indicating the removal of the hazardous waste.

#### IV. PERMITTED CLOSED UNITS

This permit is applicable only to the units known as the North Surge Pond, South Surge Pond, Sulfide Pond, Sludge Ponds 1, 2, 3, and 4, located on the property of Pioneer Americas LLC, Iberville Parish, Louisiana. This permit also applies to any appurtenances associated with these units. The appurtenances are defined as any run-on/run-off control systems, leachate collection/leak detection systems, tanks, and/or piping and instrumentation associated with these regulated units. If any additional appurtenances are added in the future, they would be addressed through a permit modification as required by regulation and this permit.

**TABLE 1  
INVENTORY AT CLOSURE**

UNIT NAME	UNIT TYPE	Size
North Surge Pond	Surface Impoundment	160' x 100'
South Surge Pond	Surface Impoundment	160' x 90'
Sulfide Pond	Surface Impoundment	200' x 70'
Pond 1	Surface Impoundment	300' x 150'
Pond 2	Surface Impoundment	610' x 130'
Pond 3	Surface Impoundment	260' x 130'
Pond 4	Surface Impoundment	230' x 170'

#### V. PERMIT CONDITIONS APPLICABLE TO PERMITTED CLOSED UNITS

##### V.A. POST-CLOSURE CARE PERIOD

The post-closure care period will be in effect for the period of thirty (30) years, unless extended or shortened by the Administrative Authority, as specified in LAC 33:V.3521.A., Length of Post-Closure.

**V.A.1** Closed Ponds 1-2: On July 1, 1981, the post-closure care period began. The LDEQ verified that the unit was closed in accordance with the approved Closure Plan and all applicable regulations.

**V.A.2** Closed Pond 3: On April 5, 1983, the post-closure care period began. The LDEQ verified that the unit was closed in accordance with the approved Closure Plan and all applicable regulations.

**V.A.3** Closed Pond 4: On October 15, 1986, the post-closure care period began. The LDEQ verified that the unit was closed in accordance with the approved Closure Plan and all applicable regulations.



V.A.4. Sulfide Pond: On May 8, 1984, the post-closure care period began. The LDEQ verified that the unit was closed in accordance with the approved Closure Plan and all applicable regulations.

V.A.5. North and South Surge Ponds: On April 21, 1989, the post-closure care period began. The LDEQ verified that the unit was closed in accordance with the approved Closure Plan and all applicable regulations.

## V.B. POST-CLOSURE MAINTENANCE

After final closure, the owner or operator must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, Condition III.O of this permit and the approved post closure plan. This also includes maintenance and monitoring throughout the post-closure care period specified in the permit under Condition V.A and LAC 33:V.3521.A.1.

For all permit units in Post-Closure, the owner or operator must:

V.B.1. maintain the integrity and effectiveness of the final cover, including making repairs as necessary to correct the effects of settling, subsidence, erosion, or other events;

V.B.2. maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of LAC 33:V, Chapter 33;

V.B.3. manage a run-on and run-off control system to prevent erosion at and other damage to the final cover;

V.B.4. maintain the final cover designed and constructed to:

V.B.4.a. provide long-term minimization of migration of liquids through the surface impoundments;

V.B.4.b. function with minimal maintenance at all permitted units;

V.B.4.c. promote drainage and minimize erosion or abrasion of the final cover at all permitted units;

V.B.4.d. accommodate settling and subsidence, as necessary, so that the cover's integrity is maintained for all permitted units; and

V.B.4.e. have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present at the surface impoundments.

**V.B.5.** The annual report shall include a Post-Closure activity report for the North Surge Pond, South Surge Pond, Sulfide Pond, and Ponds 1-4.

**V.C. POST-CLOSURE RESTRICTIONS**

The administrative authority may require, at partial and final closure, continuation of any of the security requirements of LAC 33:V.1507, during part of all of the post-closure period when access by the public or domestic livestock may pose a hazard to human health.

**V.D. POST-CLOSURE PROPERTY OF SITE USE**

1. Post-closure use of property on or in which hazardous wastes remain after partial or final closure must never be allowed to disturb the final cover, liner(s), or any other components of the containment system, or the function of the permitted closed unit's monitoring systems, unless the administrative authority find that the disturbance:
  - a. is necessary to the proposed use of the property and will not increase the potential hazard to human health or the environment; or
  - b. is necessary to reduce a threat to human health of the environment.
2. Any post-closure activity other than that specified in this permit must have prior approval of the Administrative Authority.

## VI. GROUNDWATER PROTECTION

### VI.A. APPLICABILITY

The regulations of LAC 33:V, Chapters 3, 5, 15, 29, 33, 35, and 37, and Louisiana Hazardous Waste Control Law Revised Statute R.S., 30:2171 of the Environmental Quality Act, R.S., 30:2001 et seq., and the provisions of Condition VI shall apply to groundwater protection programs at the units identified in Condition IV, Table 1 of this permit. Accordingly, the units referenced in Condition IV, Table 1 of the permit are subject to post-closure groundwater monitoring.

All requirements of Condition VI must be satisfied and shall apply until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition III.O.7 of this permit. This includes the compliance, closure, and post-closure care periods.

If groundwater contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the Permittee shall establish, expand or continue, assessment and corrective action in accordance with the requirements of LAC 33:V.Chapter 33 and as subsequently directed by the Administrative Authority.

### VI.B. REQUIRED PROGRAMS

The Permittee must continue to conduct a Compliance Monitoring Program per Condition VI.I using all existing systems necessary to comply with the monitoring specified herein and as stated in the most current approved Sampling and Analysis Plan. The Permittee must notify the Administrative Authority in accordance with the schedule specified in Conditions VI.I and VI.L, when any of the hazardous constituents or indicator parameters are detected in concentrations equal to or exceeding the designated limits at the point of compliance or upon first detection in any other monitoring well at the facility.

The Permittee must institute corrective action in all areas where groundwater has been affected by hazardous constituents or indicator parameters exceeding the assigned concentration limits. In the event statistically significant evidence that the concentration limits defined in Condition VI.D and Table 3 of this permit have been exceeded in any groundwater monitoring wells in Table 2 of this permit, the Permittee shall modify the permit in accordance with LAC 33:V.321 and Condition VI.J of this permit in order to establish a Corrective Action Program. Corrective action must continue uninterrupted to the fullest extent until groundwater problems are abated per the requirements of LAC 33:V.3321 and this requirement is terminated through permit modification in accordance with LAC 33:V.321 and 322, as applicable.

### **VI.C. GROUNDWATER PROTECTION STANDARD**

The groundwater protection standard shall be required during the Compliance Monitoring Program and/or Correction Action Program and is the concentration limit that shall indicate when corrective action must begin and when it may be terminated. The Administrative Authority shall establish the groundwater protection standard when hazardous constituents from a regulated unit have been detected (as defined by LAC 33.V.3303.A.1) in the groundwater.

Accordingly, the Permittee must comply with the conditions specified in this permit that are designed to ensure that hazardous constituents (Condition VI.D) detected (as defined by LAC 33.V.3303.A.1) do not exceed the concentration limits (Condition VI.D) in the uppermost permeable zones underlying the regulated units, beyond or below the point of compliance (Condition VI.E) during the compliance period (Condition VI.F).

The groundwater protection standard does not exempt the Permittee from required corrective action regarding contamination detected at wells not designated as point of compliance.

### **VI.D. HAZARDOUS CONSTITUENTS, PARAMETERS, ANALYTICAL FREQUENCY AND CONCENTRATION LIMITS**

The wells, hazardous constituents and concentration limits to which the groundwater protection standard of LAC 33.V.3305 apply are shown herein in Tables 2 and 3. The sampling frequency for the hazardous constituents is noted in Table 2. The concentration limits for each hazardous waste constituent specified in Table 3 shall serve as the groundwater protection standard.

**Groundwater Monitoring System**  
**Pioneer Americas, LLC**  
**St. Gabriel, LA**

**Groundwater Monitoring System for Regulated Units**

Well Number	Unit	Well Type	Zone	Sampling Frequency	Analysis
15	Ponds 1-4	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
19	Ponds 1-4	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
22	Ponds 1-4	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
24	Ponds 1-4	Up-gradient Monitor	20	Semi-Annual & Annual	See Note 1 & Note 2
26	Ponds 1-4	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
27	Ponds 1-4	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
28	North-South Surge and Sulfide Ponds	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
29	North-South Surge and Sulfide Ponds	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
30	North-South Surge and Sulfide Ponds	Point of Compliance	20	Semi-Annual & Annual	See Note 1 & Table 4
35	North-South Surge and Sulfide Ponds	Down-gradient Monitor	20	Semi-Annual & Annual	See Note 1 & Table 4
41	Ponds 1-4	Up-gradient Monitor	20	Semi-Annual	See Note 1
56	North-South Surge and Sulfide Ponds	Down-gradient Monitor	20	Semi-Annual & Annual	See Note 1 & Note 2
57	North-South Surge and Sulfide Ponds	Down-gradient Monitor	20	Semi-Annual	See Note 1
58	North-South Surge and Sulfide Ponds	Down-gradient Monitor	20	Semi-Annual	See Note 1
59	North-South Surge and Sulfide Ponds	Down-gradient Monitor	20	Semi-Annual	See Note 1
32	North-South Surge and Sulfide Ponds	Down-gradient Monitor	40	Semi-Annual	See Note 1
34	North-South Surge and Sulfide Ponds	Down-gradient Monitor	40	Semi-Annual	See Note 1
37	Ponds 1-4	Down-gradient Monitor	40	Semi-Annual	See Note 1
40	All Ponds	Up-gradient Monitor	40	Semi-Annual & Annual	See Note 1 & Note 2
50	North-South Surge and Sulfide Ponds	Down-gradient Monitor	40	Semi-Annual	See Note 1
53	Ponds 1-4	Down-gradient Monitor	40	Semi-Annual	See Note 1
54	Ponds 1-4	Down-gradient Monitor	40	Semi-Annual	See Note 1
64	Ponds 1-4	Down-gradient Monitor	40	Semi-Annual	See Note 1
6	North-South Surge and Sulfide Ponds	Piezometer	20	Semi-Annual	Water Levels Only
16	Ponds 1-4	Piezometer	20	Semi-Annual	Water Levels Only
18	Ponds 1-4	Piezometer	20	Semi-Annual	Water Levels Only
21	Ponds 1-4	Piezometer	20	Semi-Annual	Water Levels Only
17b	Ponds 1-4	Piezometer	20	Semi-Annual	Water Levels Only
5	North-South Surge and Sulfide Ponds	Piezometer	40	Semi-Annual	Water Levels Only

**Notes:**

- pH, specific conductance, total mercury, dissolved mercury, total barium, dissolved barium, sulfates, and chlorides
- cyanide, phenol, sodium, magnesium, and calcium
- pH, chlorides, and total mercury
- Notes 2 and Table 4 are analyzed annually.
- Wells for the 55 foot zone will be sampled only if contamination is confirmed in the 40 foot zone.
- Table 2B is the groundwater monitoring system for the cell house and is provided for informational purposes only in Condition VI. A permit modification will not be required for any changes made to Groundwater Monitoring associated with the Cell House. All activities of AOC will be addressed via corrective action (Condition VIII) through an Administrative Order between Pioneer Chemicals, LLC and LDEQ.

**Groundwater Monitoring System**  
**Pioneer Americas, LLC**  
**St. Gabriel, LA**

**Groundwater Monitoring System for Cell House AOC (Regulated under condition VIII)**

Well Number	Unit	Well Type	Zone	Sampling Frequency	Analysis
43	Cell House	Up-gradient Monitor	20	Quarterly	See Note 1
44	Cell House	Down-gradient Monitor	20	Quarterly	See Note 1
47	Cell House	Down-gradient Monitor	20	Quarterly	See Note 1
48	Cell House	Down-gradient Monitor	20	Quarterly	See Note 1
42	Cell House	Up-gradient Monitor	40	Quarterly	See Note 1
45	Cell House	Down-gradient Monitor	40	Quarterly	See Note 1
46	Cell House	Down-gradient Monitor	40	Quarterly	See Note 1
60	Cell House	Up-gradient Monitor	Water Table	Quarterly	See Note 1
61	Cell House	Down-gradient Monitor	Water Table	Quarterly	See Note 1
62	Cell House	Down-gradient Monitor	Water Table	Quarterly	See Note 1
63	Cell House	Down-gradient Monitor	Water Table	Quarterly	See Note 1
East	Cell House	Recovery Standpipes	Water Table	Monthly	See Notes 3
Center	Cell House	Recovery Standpipes	Water Table	Monthly	See Notes 3
West	Cell House	Recovery Standpipes	Water Table	Monthly	See Notes 3

**Notes:**

1. pH, specific conductance, total mercury, dissolved mercury, total barium, dissolved barium, sulfates, and chlorides
2. cyanide, phenol, sodium, magnesium, and calcium
3. pH, chlorides, and total mercury
4. Notes 2 and Table 4 are analyzed annually.
5. Wells for the 55 foot zone will be sampled only if contamination is confirmed in the 40 foot zone.
6. Table 2B is the groundwater monitoring system for the cell house and is provided for informational purposes only in Condition VI. A permit modification will not be required for any changes made to Groundwater Monitoring associated with the Cell House. All activities of AOC will be addressed via corrective action (Condition VIII) through an Administrative Order between Pioneer Chemicals, LLC and LDEQ.

**Table 3**  
**Groundwater Monitoring Parameters**  
**Pioneer Americas, LLC**  
**St. Gabriel, LA**

Parameter	Container Type	Preservation Method	Analysis Method	PQL (ppb)	Holding Time
pH					
Specific Conductance					
Total Barium	500 ml plastic	HNO <sub>3</sub> to pH < 2	6010	20	6 months
Dissolved Barium	500 ml plastic	HNO <sub>3</sub> to pH < 2	6010	20	6 months
Total Mercury	500 ml plastic	HNO <sub>3</sub> to pH < 2	7470	2	28 days
Dissolved Mercury	500 ml plastic	HNO <sub>3</sub> to pH < 2	7470	2	20 days
Chlorides	1 liter plastic	Cool to 4° C	325.3	5,000	28 days
Total Cyanide	1 liter plastic	NAOH/ASC to > 12 Cool to 4° C	9010	40	14 days
Phenol	1 amber glass	Cool to 4° C	8270	10	7 days
Sodium	500 ml plastic	HNO <sub>3</sub> to pH < 2	6010	500	6 months
Magnesium	500 ml plastic	HNO <sub>3</sub> to pH < 2	6010	100	6 months
Calcium	500 ml plastic	HNO <sub>3</sub> to pH < 2	6010	200	6 months
Sulfates	250 ml plastic	Cool to 4° C	375.4	5,000	6 months

Note: POC wells are analyzed for LAC 33.V.3325 Table 4 annually. See LAC 33.V.3325 for methods and PQLs.

## **VI.E. POINT OF COMPLIANCE**

The point of compliance (POC) at which the groundwater protection standard of Condition VI.C applies, and at which *monitoring* must be conducted, are the vertical intervals intercepted by the wells identified in Table 2. The horizontal limit of compliance must be the surface following an imaginary line connecting the risers of monitoring wells. The vertical limit of compliance must be the uppermost aquifer.

When contamination is detected at or beyond the point of compliance for the regulated unit, additional monitoring must be conducted per Condition VI.I.6. This shall include the next vertical aquifer or permeable zone below the uppermost monitored zone. Until such time as hazardous constituents are no longer detected at the point of compliance and beyond, the groundwater quality at each monitoring well (e.g., point of compliance wells, plume defining wells and recovery wells) identified in Table 2 must be monitored. Additional monitoring wells will be installed, as required.

In the event that hazardous constituents or indicator parameters are detected at or beyond the point of compliance above the groundwater protection standard, the Permittee shall institute a Corrective Action Program per Condition VI.J. During the Corrective Action Program, the groundwater quality must be monitored in order to determine the *effectiveness of the corrective action*.

## **VI.F. COMPLIANCE PERIOD**

A compliance period is required when a Compliance Monitoring Program (Condition VI.I) and/or Corrective Action Program (Condition VI.J) is established. During the compliance period, the Permittee must determine whether the regulated units are in compliance with the groundwater protection standard at the point of compliance. The compliance period during which the groundwater protection standard of LAC 33:V.3305.A applies is until the Administrative Authority has accepted the certification of completion of post-closure care required by regulation and under Condition III.O.7 of this permit.

If a Corrective Action Program has been implemented, the compliance period cannot end until after the Permittee has demonstrated that the corrective action has been effectively implemented and the groundwater protection standard has not been exceeded for a period of three (3) consecutive years.

## **VI.G. GENERAL REQUIREMENTS**

**VI.G.1.** The Permittee's groundwater monitoring system for the previously identified hazardous waste management units in Table 1 must consist of all wells as listed in Table 2, unless changed in the future by the Administrative Authority through permit modification.



VI.G.2. The Permittee must maintain the structural and mechanical integrity and provide protection from accidental damage and surface infiltration for all wells (including piezometers) described in Table 2. The Permittee must implement a well inspection schedule and submit a written report to the Administrative Authority on any damage in accordance with Condition II.E.17 of this permit. A well cannot be abandoned unless exempted from the program at a later date by the Administrative Authority, or unless the integrity of the well is threatened. In such a case, the well must be replaced in conformance with a workplan approved by the Administrative Authority (see Condition VI.K – Construction and Abandonment of Monitoring Wells and Geotechnical Boreholes).

VI.G.3. Upgradient wells must always yield groundwater samples from the uppermost water bearing zone that are representative of groundwater that has not been affected by possible leakage from the regulated units. Downgradient and vertical point of compliance wells must yield groundwater samples from the water bearing zones that represent the quality of groundwater beneath the units that flows to the points of compliance.

VI.G.4. Each well must be measured for total depth and depth to water on the same day and prior to purging. Measurements must be to the nearest 0.1 foot. If 10% of the screened interval is blocked by sediments, the well must be redeveloped prior to the next required sampling event.

VI.G.5. Each well must be purged by evacuation to dryness or by removing a minimum of three casing volumes. The wells must be sampled immediately upon purging and/or when sufficient water for sampling has recharged the well. Other evacuation techniques (e.g., micro-purging) must be approved by the Administrative Authority prior to use. Purging methods must be consistent throughout the monitoring period.

VI.G.6. Samples must be withdrawn using dedicated or adequately cleaned equipment for each well. No equipment or method may be used that will chemically alter or influence the sample. Sampling devices other than bailers must be approved by the Administrative Authority prior to use. Care must be taken to avoid placing clean sampling equipment on the ground or on any contaminated surface. Sampling methods and equipment must be compatible throughout the monitoring period.

VI.G.7. Groundwater samples shall be monitored and analyzed for turbidity. Samples containing less than five (5) NTU (nephelometric turbidity unit) are acceptable for analysis when the analytical method is sensitive to turbidity (such as the analysis of metals). Samples containing greater than five (5) NTU are only acceptable when well development is certified by a qualified geologist as "the best obtainable". An evaluation of turbidity must accompany all potentially affected analytical values.

**VI.G.8.** Standard indicators (e.g., specific conductance, pH, etc.) listed in table 2 must be measured and will be used to indicate well integrity and possible groundwater contamination.

**VI.G.9.** A chain of custody protocol must be employed that will allow for tracking possession and handling of samples from the time of collection through laboratory analysis. All sample containers must be labeled to prevent misidentification, have proper seals, and indicate the required analytical tests.

**VI.G.10.** Sample preservation, handling and analysis must meet of the specifications of LAC 33:V.3315.D and 3315.E and Test Methods for Evaluating Solid Waste Physical/Chemical Methods 3<sup>rd</sup> Edition (EPA Publication Number SW-846, as amended) or an equivalent substitute (approved by the Administrative Authority prior to implementation). Containers, preservation methods and analytical limits are listed in Table 3 of this permit.

**VI.G.11.** The Permittee must use one of the statistical procedures outlined in the most current approved facility Sampling and Analysis Plan or LAC 33:V.3315.H in determining whether concentrations have been exceeded for the hazardous constituents specified in Table 3.

**VI.G.12.** Records of all sampling and analytical work must be maintained at the site during the life of the units, including the post-closure care period. An up-to-date field log book (or compilation of field sheets) must be kept at the site which documents, as a minimum, the following for each sample:

- well identification number;
- total well depth;
- elevation of top of casing;
- water elevations;
- calculations of the standing water volume in the well;
- water color (visual) and odor;
- field measurements and methods (pH, specific conductance, etc.);
- well evacuation procedures and equipment;
- total volume of water evacuated;
- sample withdrawal procedures and equipment;
- name of collector, sample date and time;
- sample identification numbers; and
- other field observations.

**VI.G.13.** Reporting and notification requirements shall be in accordance with Condition VI.L.

## **VI.H. DETECTION MONITORING PROGRAM**

**(RESERVED – The Permittee is currently in the Compliance Monitoring Program as per Condition VI.I.)**

## **VI.I. COMPLIANCE MONITORING PROGRAM**

The Permittee must conduct a Compliance Monitoring Program in accordance with LAC 33:V.3319 and as subsequently directed by the Administrative Authority. A Compliance Monitoring Program is required whenever hazardous constituents have been detected at the point of compliance for a regulated unit. The Permittee must continue or expand the Compliance Monitoring Program until one of the following occurs: 1) compliance with the groundwater protection standard is achieved for at least three (3) years (at that time, the Permittee must notify the Administrative Authority in writing, and upon approval submit a permit modification application to reestablish a Detection Monitoring Program); or 2) a Corrective Action Program is established with adequate monitoring as delineated in Condition VI.J and LAC 33:V.3321.D, and the permit is modified accordingly.

### **VI.I.1. Semi-Annual Monitoring for Determining Compliance with the Groundwater Protection Standard**

The Permittee must utilize the groundwater monitoring system outlined in Conditions VI.B through VI.G and as required by LAC 33:V.3315 to monitor the groundwater to determine whether regulated units are in compliance with the groundwater protection standard. Accordingly, the Permittee shall determine the concentration of each hazardous constituent and indicator parameter listed in Table 3 of this permit at least semi-annually from groundwater in the wells listed in Table 2 of this permit.

**VI.I.2.** The Permittee must determine whether there is statistically significant evidence of contamination above the groundwater protection standard for any hazardous constituent or indicator parameter specified in Condition VI.D. Statistical methods shall conform to Condition VI.G.11 and shall be completed within sixty (60) days of the groundwater monitoring event.

**VI.I.3.** If the Permittee determines, pursuant to Condition VI.I.2, that there is statistically significant evidence of contamination above the groundwater protection standard for any hazardous constituent and or indicator parameter, the Permittee must do the following:

**VI.I.3.a.** notify the Administrative Authority in writing within seven (7) days of this finding. The notification must indicate the constituent(s) which have been exceeded and their respective concentration limit(s); and

**VI.I.3.b.** submit an application for a permit modification to establish a Corrective Action Program meeting the requirements of LAC 33:V.3321 within 180 days (or ninety (90) days if the Permittee has previously submitted a certified engineering feasibility study under LAC 33:V.3317.G.5.b). The application must include the following information:

**VI.I.3.b.(1).** a detailed description and schedule for additional monitoring and corrective action that will achieve compliance with the groundwater protection standard specified in Conditions VI.C and VI.D of this permit; and

**VI.I.3.b.(2).** a geotechnical plan (certified by a qualified geologist or a geotechnical engineer) to demonstrate the effectiveness of the planned corrective action. This plan may incorporate the Compliance Monitoring Program developed to meet the requirements of this permit, except that the Permittee will be required to also monitor as frequently as necessary to demonstrate the effectiveness of the corrective action.

**VI.I.4.** If the Permittee determines, pursuant to Condition VI.I.2, that there is statistically significant evidence of contamination above the groundwater protection standard for any hazardous constituent or indicator parameter, the Permittee may demonstrate that a source other than a regulated unit caused the contamination, or that the detection is an artifact caused by an error in sampling, analysis, or statistical evaluation, or natural variation in the groundwater. The Permittee may make a demonstration under this Condition in addition to, or in lieu of, submitting a permit modification application; however, the Permittee is not relieved of the requirement to submit a permit modification application within the time specified in Condition VI.I.3.b unless the demonstration made under this Condition successfully shows that a source other than a regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, or evaluation. In making a demonstration under this Condition, the Permittee must:

**VI.I.4.a.** Notify the Administrative Authority in writing within seven (7) days that the Permittee intends to make a demonstration under this Condition;

**VI.I.4.b.** Within ninety (90) days, submit a report to the Administrative Authority which demonstrates that a source other than a regulated unit caused the standard to be exceeded or that the apparent noncompliance with the standard resulted from an error in sampling, analysis or evaluation;

**VI.I.4.c.** Within ninety (90) days, submit to the Administrative Authority an application for a permit modification to make any appropriate changes to the Compliance Monitoring Program; and

**VI.I.4.d.** Continue to monitor in accordance with the Compliance Monitoring Program established under this permit.

**VI.I.5. Annual Monitoring for LAC 33:V.3325, Table 4 Constituents**

The Permittee must utilize the groundwater monitoring system outlined in Conditions VI.B through VI.G and as required by LAC 33:V.3315 to monitor the groundwater to determine whether hazardous constituents listed in LAC 33:V.3325, Table 4 are present in the uppermost aquifer (and, if so, at what concentration). Accordingly, the Permittee shall determine the concentration of each hazardous constituent listed in LAC 33:V.3325, Table 4 *annually from all* point of compliance wells listed in Table 2 of this permit.

**VI.I.5.a.** The Permittee must determine whether there is statistically significant evidence of additional hazardous constituents not previously identified. Statistical methods shall conform to Condition VI.G.11 and shall be completed within sixty (60) days of the groundwater monitoring event.

Should results indicate that additional hazardous constituents are present, the Permittee may either resample for any of the constituents pursuant to Condition VI.I.5.b or report these additional constituents to the Administrative Authority and add them to the monitoring list and modify the permit pursuant to Condition VI.I.5.c.

**VI.I.5.b.** If the Permittee finds LAC 33:V.3325, Table 4 constituents in the groundwater that are not already identified in the permit as monitoring constituents, the Permittee may indicate in the report to the Administrative Authority (Condition VI.I.5.a) that the Permittee intends to re-sample and repeat LAC 33:V.3325, Table 4 analysis. This re-sampling must be performed within one month of the report submittal (Condition VI.I.5.a). The Permittee must report the concentrations of these additional constituents to the Administrative Authority within sixty (60) days of the groundwater monitoring event. Should results indicate that additional hazardous constituents are present, the Permittee must add them to the monitoring list and modify the permit pursuant to Condition VI.I.5.c.

**VI.I.5.c.** The Permittee must submit a permit modification application to add the additional constituents to Table 2 and Table 3 of this permit in accordance with LAC 33:V.321 and Condition II.C of this permit.

#### **VI.I.6. Additional Monitoring Requirements**

As part of the Compliance Monitoring Program, the plume must be defined and monitored by additional monitoring wells (a.k.a., assessment, plume defining, downgradient monitor wells, etc.) to satisfy LAC 33:V.3315.A.3.

**VI.I.6.a.** The additional monitoring wells listed in Table 2 must be sampled according to a frequency approved by the Administrative Authority (semi-annually), as part of the on-going evaluation of the plume, for constituents specified in Table 3.

**VI.I.6.b.** If the Permittee determines that there is statistically significant evidence of contamination for hazardous constituents or indicator parameters at any downgradient well previously reported as non-detect, the Permittee must notify the Administrative Authority of the finding in writing within seven (7) days. This notification must indicate what hazardous constituents or indicator parameters have shown statistically significant evidence of contamination. Further, the Permittee must do one of the following:

**VI.I.6.b.(1)** Submit a workplan to the Administrative Authority within ninety (90) days from the date of the confirmation of contamination. The workplan must detail the specific additional assessment procedures the Permittee will conduct to identify the full extent of the plume. The workplan shall include any proposed changes to the groundwater monitoring system, monitoring frequency, sampling and analysis procedures and methods, and/or statistical methods; or

**VI.I.6.b.(2)** Demonstrate that a source other than a regulated unit caused the contamination or that the detection is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the groundwater. The Permittee may make a demonstration under this Paragraph in addition to, or in lieu of, submitting an assessment workplan; however, the Permittee is not relieved of the requirement to submit an assessment workplan within the time specified unless the demonstration made under this Paragraph successfully shows that a source other than a regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, or evaluation. In making a demonstration under this Paragraph the Permittee must:

**VI.I.6.b.(2).a.** Specify the Permittee's intention to make a demonstration under this Paragraph when notifying the Administrative Authority of the statistically significant evidence of contamination;

**VI.I.6.b.(2).b.** Within ninety (90) days, submit a report to the Administrative Authority that demonstrates that a source other than a regulated unit caused the contamination or that the contamination resulted from error in sampling, analysis, or evaluation. Further, the Permittee must submit an application for a permit modification to make any appropriate changes to the monitoring program; and

**VI.I.6.b.(2).c.** Continue to monitor in accordance with the monitoring program established under this permit.

#### **VI.I.7. Changes to the Compliance Monitoring Program**

If the Permittee determines that the Compliance Monitoring Program no longer satisfies the requirements of this permit, the Permittee must within ninety (90) days submit an application for a permit modification to make any appropriate changes to the program.

Any time the Administrative Authority determines that the Compliance Monitoring Program does not satisfy the requirements of this permit, the Permittee shall, within ninety (90) days of notification of such determination, submit an application for a permit modification to make any appropriate changes to the program.

#### **VI.J. CORRECTIVE ACTION PROGRAM**

**(RESERVED - The Permittee currently is in the Compliance Monitoring Program as per Condition VI.I. The requirements of VI.J [in *italics*] are included for informational purposes only and are meant to provide a course of action in the event a Corrective Action Program is required. In the event a Corrective Action Program is required, the permit will be modified in accordance with LAC 33:V.321 and Condition VI.I of this permit and the requirements of VI.J will become enforceable.)**

*A Corrective Action Program is required whenever the groundwater protection standard has been exceeded at or beyond the point of compliance for a regulated unit. The Permittee must continue or expand the Corrective Action Program in accordance with the requirements of LAC 33:V.3321 and as subsequently directed by the Administrative Authority to the fullest extent until groundwater problems are abated. The Corrective Action Program shall be initiated and completed by the Permittee within a period of time specified by the Administrative Authority and until such time as this requirement is terminated through permit modification.*

##### *VI.J.1. Corrective Action Objectives*

*The Corrective Action Program must:*

*VI.J.1.a. protect human health and the environment;*

*VI.J.1.b. attain compliance with the groundwater protection standard as specified in Condition VI.C;*

*VI.J.1.c. control the source(s) of releases so as to reduce or eliminate, to the maximum extent practicable, further releases of hazardous constituents or indicator parameters into the environment that may pose a threat to human health or the environment;*

*VI.J.1.d. meet applicable statutory and regulatory requirements; and*

*VI.J.1.e. meet acceptable waste management requirements.*

#### *VI.J.2. Implementation and Monitoring of the Corrective Action Program*

*The Permittee must implement the Corrective Action Program according to the approved Corrective Action Plan and schedule contained therein.*

*VI.J.2.a. The Permittee must conduct groundwater monitoring as described in the approved corrective action plan. The groundwater monitoring program:*

*VI.J.2.a.(1). may be based upon the requirements of the Compliance Monitoring Program (Condition VI.I);*

*VI.J.2.a.(2). must be as effective as the Compliance Monitoring Program in determining compliance with the groundwater protection standard; and*

*VI.J.2.a.(3). must indicate the effectiveness of the corrective action and have ongoing assessment monitoring.*

*VI.J.2.b. The Permittee must evaluate and report the effectiveness and progress of the corrective action semi-annually to the Administrative Authority as required by LAC 33:V.3321.G and in accordance with Condition VI.L.1.o. The evaluation shall include the following:*

*VI.J.2.b.(1). general discussion on the effectiveness of the corrective action in achieving the corrective action goals, and progress being made toward completion;*

*VI.J.2.b.(2). trend analysis and updated schedule for completion of the corrective action;*



*VI.J.2.b.(3). evaluation of performance reliability, ease of implementation and any encountered concerns or problems;*

*VI.J.2.b.(4). any changes to surrounding land use or environmental receptors that may impact effectiveness;*

*VI.J.2.b.(5). recommendations for improvement;*

*VI.J.2.b.(6). recovered amounts for each component of a recovery system (e.g., recovery wells, French drain systems, etc.) and the entire system; recovered amounts for both contaminants and all liquids; recovered amounts for both the reporting period and since recovery implementation; and*

*VI.J.2.b.(7). graphical and statistical analyses, as necessary, to demonstrate the effectiveness and progress (the Administrative Authority may also require predictive computer modeling, as per LAC 33:V.3303.D).*

#### *VI.J.3. Revisions to the Corrective Action Program*

*If the Permittee determines that the Corrective Action Program (including monitoring) no longer satisfies the requirements of this permit, the Permittee, within ninety (90) days, shall submit an application for a permit modification to make any appropriate changes to the program.*

*Any time the Administrative Authority determines that the Corrective Action Program does not satisfy the requirements of this permit, the Permittee shall, within ninety (90) days of notification of such determination, submit an application for a permit modification to make any appropriate changes to the program.*

#### *VI.J.4. Completion of Corrective Action Program*

*If the Permittee is conducting corrective action at the end of the compliance period, the Permittee must continue for as long as necessary to achieve compliance with the groundwater protection standard. The Corrective Action Program may be terminated when the groundwater protection standard is being met at the point of compliance and throughout the entire zone affected by the release for at least three (3) consecutive years.*

*VI.J.4.a. The Permittee must demonstrate to the satisfaction of the Administrative Authority that the groundwater protection standard is being met.*

*VI.J.4.b. Upon successful demonstration from the Permittee that the corrective action should be terminated, the Permittee must submit to the Administrative Authority an application for permit modification pursuant to LAC 33:V.321. The application will include provisions to establish either a Detection Monitoring Program or Compliance Monitoring Program on a schedule approved by the Administrative Authority.*

*VI.J.4.c. Upon modification of the permit, the Permittee shall be released from the requirements for financial assurance for corrective action under LAC 33:V.3301.B.*

## **VI.K. CONSTRUCTION AND ABANDONMENT OF MONITORING WELLS AND GEOTECHNICAL BOREHOLES**

The construction and abandonment of groundwater monitoring wells must conform to the standards and guidelines specified in "CONSTRUCTION OF GEOTECHNICAL BOREHOLES AND GROUNDWATER MONITORING SYSTEMS HANDBOOK", dated May 1993 ("Construction Handbook", May 1993). This document is printed by and available from the Louisiana Department of Transportation and Development (DOTD), Water Resources Section, P.O. Box 94245, Baton Rouge, Louisiana 70804-9245.

**VI.K.1.a.** A workplan for the construction of a new well must be submitted to the Administrative Authority for approval as the entire groundwater monitoring system must be approved. Any required new well should be installed within thirty (30) days of approval of the workplan by the Administrative Authority. Upon completion of new or replacement well, a copy of DOTD-GW-1 S, DOTD Well Registration Short Form, is to be provided to the Administrative Authority.

**VI.K.1.b.** The Permittee must provide for the sealing of any vertical migration path resulting from exploratory boring, leachate collection or detection systems and/or groundwater monitoring programs as provided in LAC 33:V.3323. A workplan for the plugging and abandonment of a well must be submitted for approval by the Administrative Authority, whenever such migration pathways are discovered. Upon completion of well abandonment, a copy of DOTD-GW-2, DOTD Well Plugging and Abandonment Form, is to be provide to the Administrative Authority.

## **VI.L. REPORTING AND NOTIFICATION REQUIRMENTS**

### **VI.L.1. Semi-Annual Groundwater Report**

A semi-annual groundwater report for each six-month period of January through June must be submitted to the Administrative Authority no later than September 1<sup>st</sup> of the same calendar year. The report shall include the following:

**VI.L.1.a.** a general discussion on sampling, analytical, statistical and QA/QC procedures;

**VI.L.1.b.** a table showing well number, well depth, interval screened, zone monitored, well diameter, screen and casing material (and the type of pump, if applicable) for all wells;

**VI.L.1.c.** a facility map showing all wells (up-gradient, point of compliance, assessment, plume defining and recovery) and identifying zones in which wells are screened;

**VI.L.1.d.** a scaled potentiometric surface map showing well locations, groundwater elevations with respect to mean sea level for each monitored zone;

**VI.L.1.e.** documentation of the chain of custody of all sampling and analyses;

**VI.L.1.f.** all analytical data, including QA/QC;

**VI.L.1.g.** a tabular summary of all analytical data;

**VI.L.1.h.** a statistical method shall be used in evaluating data for each required indicator parameter (e.g., pH, specific conductance, total organic carbon, total organic halogen) and hazardous constituent, as approved by the Administrative Authority;

**VI.L.1.i.** tables and graphical representation of the values of the required indicator parameters and the hazardous constituents including:

**VI.L.1.i.(1).** contaminant concentration isopleth maps;

**VI.L.1.i.(2).** contaminant concentration versus time graphs;

**VI.L.1.j.** a statement of whether a statistically significant difference in concentration is detected;

**VI.L.1.k.** a discussion of any significant changes in the data from the last reporting period;

**VI.L.1.l.** a discussion of inspections and maintenance of the groundwater monitoring system, physical condition of the wells, including down time for any well or part of the system and actions taken to return the system to normal operations and maximum efficiency;

**VI.L.1.m.** a discussion of water-quality properties (i.e., color, odor, etc.);

**VI.L.1.n.** disposition of purge water and other potentially contaminated materials; and

**VI.L.1.o.** evaluation of the effectiveness and progress of any corrective action according to Condition VI.J.2.b.

#### **VI.L.2. Annual Groundwater Report**

An annual groundwater report must be submitted to the Administrative Authority no later than March 1<sup>st</sup> of the following calendar year as required by LAC 33:V.1529.D.8.

**VI.L.2.a.** The report must contain the reporting requirements of Condition VI.L.1 for the six-month period of July through December.

**VI.L.2.b.** In addition, the report must summarize and interpret all groundwater activities for the preceding calendar year including an evaluation of the monitoring strategy in relation to the direction of groundwater flow and locations of wells associated with the units. Applicable calculations must also include groundwater flow rates, contaminant migration rates (as applicable), statistical comparisons, trend analyses, and any other pertinent information regarding the adequacy of the monitoring system.

#### **VI.L.3. Notification of Statistically Significant Evidence of Contamination**

The Permittee must notify the Administrative Authority in accordance with Conditions VI.H, VI.I or VI.J when there is statistically significant evidence of contamination for hazardous constituents or indicator parameters.

#### **VI.L.4. Notification of Release to SPOC**

In the event of a release in, into, within, or on any groundwaters of the state, (i.e., any confirmation of contamination in any previously uncontaminated saturated subsurface strata) the Permittee must notify the Department within twenty-four (24) hours of confirming statistically significant evidence of a release. Notification shall be made to the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) in accordance with LAC 33:309.L.7 and Condition II.E.16 of this permit. This requirement is in addition to notification requirements to the Administrative Authority discussed in Conditions VI.H, VI.I or VI.J.

# **HAZARDOUS AND SOLID WASTE AMENDMENTS**

# ATTACHMENT 1

**ATTACHMENT 1**  
**LIST OF FACILITY DOCUMENTS INCORPORATED**  
**IN THE PERMIT BY REFERENCE**  
**LAD062666540 AI# 2644**

<b>DOCUMENT TYPE</b>	<b>DOCUMENT DATE</b>	<b>EDMS DOCUMENT ID #</b>	<b>COMMENTS</b>
Arrangements with local authorities	10/06/2004	32438910	Updated post closure renewal application Arrangements with local police and fire departments, local hospital and emergency response teams to assist in emergency response process.
Post-Closure cost estimates	02/09/2006	32438910 Attachment 14	Information regarding the cost estimates can be found in Attachment 14.
Post-Closure Plan	02/09/2006	32438910 Attachment 15	These plans are identified in Appendix K of the Post - Closure renewal permit application dated May 2004.
Contingency Plan	10/06/2004	32438910 Appendix J	The Contingency Plan identifies emergency and security information for the plant.
Inspection Plan	10/06/2004	32438910 Appendix M	This report contains the inspection plan that is needed to satisfy the minimum inspection requirements for hazardous waste treatment, storage, and disposal.
Personnel Training Plan	10/06/2004	32438910 Appendix O	This plan, located in volume I, chapter 5, of the Post-Closure permit application, documents the training required of personnel involved with the hazardous waste facilities.
Waste Analysis Plan	10/06/2004	32438910 Appendix L	The Waste Analysis Plan located in the RCRA Contingency Plan's attachment 1, is designed to satisfy the general waste analysis standards outlined in LAC 33:V.1519.
Revised Groundwater Sampling and Analysis Plan	02/09/2004	33957796 Attachment 7	This document modifies the monitoring requirements of LAC 33:V. Chapter 33.